DATA EVALUATION RECORD

TRIMETHYLAMINE
(Bull Run Fly Attractant)

STUDY TYPE: **Waiver Requests**
Aquatic Invertebrate Acute Toxicity (OPPTS 850.1010)
Fish Acute Toxicity (OPPTS 850.1075)
Avian Acute Oral Toxicity (OPPTS 850.2100)
Avian Dietary Toxicity (OPPTS 850.2200)
Seeding Emergence (OPPTS 850.4100)
Vegetative Vigor (OPPTS 850.4150)
Nontarget Insect Testing (OPPTS 880.4350)

MRID 47396932

Prepared for
Biopesticides and Pollution Prevention Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard
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Arlington, VA 22202

Prepared by
Toxicology and Hazard Assessment Group
Environmental Sciences Division
Oak Ridge National Laboratory
Oak Ridge, TN 37830
Task Order No. 08-031

Primary Reviewer:
Eric B. Lewis, M.S.

Signature: Eric B. Lewis
Date: JUL 27 2008

Secondary Reviewers:
Sylvia Milanez, Ph.D., D.A.B.T.

Signature:
Date: JUL 27 2008

Robert H. Ross, M.S., Group Leader

Signature: Robert H. Ross
Date: JUL 27 2008

Quality Assurance:
Lee Ann Wilson, M.A.

Signature: L. A. Wilson
Date: JUL 27 2008

Disclaimer

This review may have been altered subsequent to the contractor's signatures above.

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DATA EVALUATION RECORD

EPA Secondary Reviewer:

STUDY TYPE:	Waiver Requests Aquatic Invertebrate Acute Toxicity (OPPTS 850.1010) Fish Acute Toxicity (OPPTS 850.1075) Avian Acute Oral Toxicity (OPPTS 850.2100) Avian Dietary Toxicity (OPPTS 850.2200) Seeding Emergence (OPPTS 850.4100) Vegetative Vigor (OPPTS 850.4150) Nontarget Insect Testing (OPPTS 880.4350)
MRID NO:	47396932
DECISION NO:	392213
DP BARCODE:	DP353134
TEST MATERIAL:	Indole
PROJECT STUDY NO:	Not applicable
SPONSOR:	Bull Run Scientific, VBT, 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519
TESTING FACILITY:	Not applicable
TITLE OF REPORT:	Trimethylamine: Effects on Non-Target Organisms
AUTHOR:	Smith, C.A.
STUDY COMPLETED:	April 2, 2008
CONFIDENTIALITY CLAIMS:	None
GOOD LABORATORY PRACTICE:	A signed and dated GLP statement was included. The study is descriptive in nature, and not subject to the requirements of 40 CFR Part 160.
CONCLUSION:	The information provided is sufficient to support the requested waiver for Nontarget Insect Testing for trimethylamine. The registrant needs to more specifically address why waivers should be granted for Aquatic Invertebrate Acute Toxicity, Fish Acute Toxicity, Avian Acute Oral Toxicity, Avian Dietary Toxicity, Seeding Emergence, and Vegetative Vigor.

Test Material

Trimethylamine (present in Bull Run Fly Attractant at 2.8% w/w).

Product Description

Bull Run Fly Attractant is an end use product to be used as an attractant for "filth flies" such as house flies, blow flies, bottle flies, lesser house flies, cluster flies, lance flies, secondary screwworm flies, flesh flies, and false stable flies. The product is composed of a fly attractant mix (97.3% w/w) in a [redacted]. Trimethylamine is present in the product at a concentration of 2.8%. The pouch of attractant is contained in a disposable or reusable trap that is filled with the appropriate amount of water and hung in the treatment area.

Waiver Request

The registrant is requesting waivers for the following requirements:

Aquatic Invertebrate Acute Toxicity	(OPPTS 850.1010)
Fish Acute Toxicity	(OPPTS 850.1075)
Avian Acute Oral Toxicity	(OPPTS 850.2100)
Avian Dietary Toxicity	(OPPTS 850.2200)
Seeding Emergence	(OPPTS 850.4100)
Vegetative Vigor	(OPPTS 850.4150)
Nontarget Insect Testing	(OPPTS 880.4350)

Registrant's Justification

Bull Run Fly Attractant is to be packaged in units with net weights of 0.51, 1.45, 1.96, or 2.47 ounces. Assuming use of the largest units at the maximum use rate of 48 traps/acre, the maximum environmental exposure to trimethylamine would be 0.208 lbs/acre:

(48 traps/acre) x (2.47 oz attractant/trap) x (2.8 oz trimethylamine/100 oz attractant) = 3.32 oz trimethylamine/acre

(3.32 oz trimethylamine/acre) x (1 lb/16 oz) = 0.208 lb trimethylamine/acre.

In field tests to determine efficacy of the Bull Run Fly Attractant (MRID 47396903), the contents of traps deployed for 3 to 31 days were examined and revealed no evidence of nontarget organisms, including honeybees or other beneficial insects, being attracted to the traps.

Trimethylamine is a small, nitrogen-containing molecule that is miscible in water and is a plant nutrient. Therefore, it is not expected to accumulate in the environment.

There is no reason to believe that the use of trimethylamine in Bull Run Fly Attractant would have an adverse effect on any nontarget or endangered species.

Reviewer's Comments

The reviewer believes that the information provided is sufficient to support the requested waiver for Nontarget Insect Testing. The registrant needs to more specifically address why waivers should be granted for Aquatic Invertebrate Acute Toxicity, Fish Acute Toxicity, Avian Acute Oral Toxicity, Avian Dietary Toxicity, Seeding Emergence, and Vegetative Vigor.